

EXHIBIT 16

FILED UNDER SEAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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GOOGLE LLC,)
)
Plaintiff,) Case No.
) 3:20-cv-06754-WHA
vs.) Related to CASE No.
) 3:21-cv-07559-WHA
SONOS, INC.,)
)
Defendants.)
_____)

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Videotaped Zoom Deposition of
ALLISON ELLIOTT
Highly Confidential - Attorney's Eyes Only
Friday, May 27, 2022

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Veritext Job No.: 5251903
Katy E. Schmidt
RPR, RMR, CRR, CSR 13096

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1 Google Play Music was? 01:51	1 Q. And what was your role in the YouTube 01:54
2 A. No. 01:51	2 integration with Sonos speakers? 01:54
3 Q. Are you familiar with the code name Devo, 01:51	3 A. I was a partner product manager and I was 01:54
4 D-e-v-o. 01:51	4 going to be working with -- I was going to be working 01:54
5 A. No. I don't think so. No. 01:51	5 with Google and Sonos to help figure out how 01:54
6 Q. Are you familiar with the code name Encore? 01:51	6 YouTube Music and Sonos and Google Play Music, both of 01:55
7 A. Yes. 01:51	7 which had independent SMAPI integrations, could be 01:55
8 Q. And what did Encore refer to? 01:51	8 combined when Google combined Google Play Music with 01:55
9 A. That was a player launch. That was the launch 01:51	9 YouTube, and we had started those conversations. 01:55
10 of the Play:5. 01:52	10 However, that combination event was delayed on Google's 01:55
11 Q. Are you familiar with the code name Sol, 01:52	11 side well past the point when I switched roles and was 01:55
12 S-o-l? 01:52	12 no longer working with partners. 01:55
13 A. It rings a bell, but I don't remember which 01:52	13 Q. So your involvement with the YouTube 01:55
14 thing it refers to. 01:52	14 integration was only on the SMAPI side of things? 01:55
15 Q. What about the code name Sonar? 01:52	15 A. Yes. 01:55
16 A. Yes. 01:52	16 Q. Were you involved in any discussions about a 01:55
17 Q. What does Sonar refer to? 01:52	17 direct playback integration with YouTube? 01:55
18 A. That was a player launch, but I don't remember 01:52	18 A. I don't remember any discussions about a 01:55
19 which player. 01:52	19 direct playback integration with YouTube. 01:55
20 Q. Are you familiar with the code name Eno or 01:52	20 Q. Do you know if Google and Sonos collaborated 01:56
21 Eno, E-n-o? 01:52	21 on a direct playback integration? 01:56
22 A. Yes. Yes. 01:52	22 A. I -- no, I don't know. 01:56
23 Q. What did that code name refer to? 01:52	23 Q. Who on the Sonos side worked on the 01:56
24 A. That was a Spotify -- one of the important 01:52	24 YouTube SMAPI integration? 01:56
25 Spotify launches, but I don't remember the exact scope 01:52	25 A. I don't remember who worked at Sonos on the 01:56
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1 of that launch. 01:52	1 YouTube SMAPI integration or even if there was anyone 01:56
2 Q. When you say they were one of the Spotify 01:52	2 from engineering deeply involved. 01:56
3 launches, what were the various Spotify launches? 01:52	3 Q. Who would know that information? 01:56
4 A. I didn't work on Spotify so I can't really 01:53	4 A. I don't know who would know that either. 01:56
5 even tell you what was incorporated in each Spotify 01:53	5 Q. Do you know if the YouTube SMAPI 01:57
6 launch. 01:53	6 integration -- scratch that. 01:57
7 Q. What about the code name Jay Z? 01:53	7 When you said that you're part of a 01:57
8 A. Yes. That was a release, a particular 01:53	8 conversation about how YouTube Music had to be combined 01:57
9 release, but I don't remember exactly the scope of that 01:53	9 with Google Play Music to integrate to Sonos speakers, 01:57
10 release. I don't remember that being associated with a 01:53	10 what does that mean? 01:57
11 particular partner. 01:53	11 A. It wasn't that they had to be combined to 01:57
12 Q. Was there a code name for the direct playback 01:53	12 integrate to Sonos speakers. It was just that, like, 01:57
13 launch of Pandora? 01:53	13 Google had bought YouTube and now had YouTube music, so 01:57
14 A. Probably. Embarrassingly, I don't remember 01:53	14 Google was eventually going to be deprecating 01:57
15 what it was, though. 01:53	15 Google Play Music. And when that happened, that was 01:57
16 Q. Earlier you mentioned you were involved in 01:53	16 going to have an impact on Sonos customers. 01:58
17 discussions of a YouTube integration with Sonos 01:53	17 So Sonos had to figure out how to make it as 01:58
18 speakers. 01:54	18 seamless as possible for the people who were using 01:58
19 Do you recall that? 01:54	19 Google Play Music to migrate over to YouTube and have 01:58
20 A. Yes. 01:54	20 that work on Sonos as well. 01:58
21 Q. What time frame were you involved in those 01:54	21 Q. Were you part of any discussions of the 01:58
22 discussions? 01:54	22 technology that would be used for that transition? 01:58
23 A. It was before I switched roles but towards the 01:54	23 A. I attended two meetings about the technology 01:58
24 end of the time I worked in partnerships so I'm guessing 01:54	24 that would be used there, but they were early 01:58
25 it was at the very end of 2017. 01:54	25 conversations and I have no idea if that was the actual 01:58
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